

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208

REPLY COMMENTS OF
ALASKA COMMUNICATIONS SYSTEMS GROUP, INC.

Alaska Communications Systems Group, Inc., on behalf of its operating subsidiaries (“ACS”),¹ hereby responds to comments filed in the above-referenced dockets with regard to its Petition for Limited Waiver (“Petition”) of the new call

¹ In this proceeding Alaska Communications Systems Group, Inc. represents four local exchange carriers, ACS of Alaska, Inc., ACS of Anchorage, Inc., ACS of Fairbanks, Inc., and ACS of the Northland, Inc., as well as ACS Long Distance, Inc., ACS Cable, Inc., ACS Internet, Inc., and ACS Wireless, Inc. Together, these companies provide wireline and wireless telecommunications, information, broadband, and other network services to residential, small business and enterprise customers in the State of Alaska and beyond, on a retail and wholesale basis, using ACS’s statewide and interstate facilities.

signaling rules (the “phantom traffic” rules)² adopted by the Commission in its *USF/ICC Transformation Order*.³ ACS has requested a limited waiver of the phantom traffic rules because, in certain circumstances, it is not technically feasible for ACS to fully implement the rules. As ACS stressed in its Petition, its Signaling System 7 (“SS7”) switches and Multi-Frequency (“MF”) signaling trunks are not capable of generating or passing the Calling Party Number (“CPN”) or Charge Number (“CN”) in all cases as required by the new “phantom traffic” rules. Also, ACS continues to stress that Voice over Internet Protocol (“VoIP”) is still an emerging new service and industry standards are not yet in place to ensure reliable information can be generated or passed on IP signaling.

There were no comments opposing ACS’s Petition, but rather comments filed urged the Commission to ensure that any waiver was limited in circumstances and supported by sufficient detail.⁴ While ACS believes that it has already provided good cause for the Commission to grant its limited waiver request, ACS further supplements its Petition here with additional detail in support of its request and further demonstrates the narrow circumstances in which it seeks a waiver.

² See 47 C.F.R. §64.1601(a)(1)-(2).

³ *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, in WC Docket Nos. 10-90 *et al.*, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”).

⁴ See Comments of National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telephone Companies, Western Telecommunications Alliance, and the National Exchange Carrier Association, Inc., *Connect America Fund et al.*, WC Docket No. 10-90 *et al.* at 2 (April 23, 2012) and Comments of CenturyLink, *Connect America Fund et al.*, WC Docket No. 10-90 *et al.* at 2 (April 23, 2012).

SS7 Charge Number

ACS noted in its Petition that PRI trunk groups associated with its SS7 switches are set up to send out both CPN and CN, but upon further review ACS has determined that even its PRI trunk groups have not always been configured to pass CN where it differs from CPN. ACS would need to audit all of its PRI trunk groups to determine where alternate configurations may have been implemented, which would involve significant engineering staff review. Once that determination was made, ACS would need to contact the customers where alternate configurations were put in place, notifying them about necessary modifications, which would involve significant amount of time from customer service staff. Finally, ACS would need to implement the configuration changes, necessitating further engineering staff time. ACS estimates that this assessment of PRI trunk groups, customer communication, and re-configuration of PRI trunk groups would require approximately six months.

MF Signaling Automatic Number Identification

It is important to highlight that in certain circumstances with MF signaling no CN or CPN can be passed to a terminating carrier in the MF ANI field. Specifically, when an interexchange carrier (“IXC”) brings traffic from a rural local exchange carrier (“LEC”) in Alaska to ACS either to be terminated on its local exchange network or to be transported by ACS as an IXC to other carriers for termination in the Lower 48, ACS can only pass the CN and CPN that it receives. ACS often finds that no CN or CPN is passed with the traffic it receives from these IXCs in Alaska. ACS has no control over whether these IXCs carrying traffic from other rural LECs provide CN or CPN in the MF ANI

field, but it is ACS's understanding that when this information is not passed it is due to a technical implementation problem with the IXC's switch.

VoIP Traffic Connecting to PSTN

ACS, like many other carriers, is a new entrant into the VoIP market and does not fully know the parameters of issues that it may encounter with transmitting the telephone number of a calling party when IP signaling is involved in termination of the call to the PSTN. As an intermediate carrier of VoIP traffic, ACS has already seen inconsistencies with ANI information. Sometimes it receives ANI from a VoIP provider that sends traffic to ACS, and when that information is passed then ACS passes it to the terminating carrier. However, ACS does not always receive ANI from VoIP providers and cannot pass what it does not receive. Furthermore, while the industry continues to develop IP signaling standards, ACS agrees with Verizon that information received from VoIP providers and passed along to terminating carriers is subject to the limitations of "garbage in, garbage out."⁵

As the industry moves to bill and keep as part of the Commission's reform of intercarrier compensation, phantom traffic concerns will be mooted and therefore strict compliance with the new phantom traffic rules is not warranted in light of the costs of time, manpower, and dollars to fully implement them. ACS also agrees with GCI that the USF/ICC reform record "does not suggest that Alaska carriers have encountered the significant call signaling or phantom traffic problems that motivated the recent reforms."⁶

⁵ See Reply Comments of Verizon in Support of Limited Waiver, *Connect America Fund et al.*, WC Docket No. 10-90 *et al.* at 6 (April 3, 2012).

⁶ See Reply Comments of General Communication, Inc., *Connect America Fund et al.*, WC Docket No. 10-90 *et al.* at 2 (April 17, 2012).

ACS's limited resources would be better applied toward expanding broadband consistent with the Commission's goals in the *USF/ICC Transformation Order*.

Respectfully submitted,

/s/

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